

William L. Gavras, Esq.
LAW OFFICES OF GORMAN & GAVRAS
A Professional Corporation
2nd Floor, J&R Building
208 Route 4
Hagåtña, Guam 96910
Telephone: 472-2302
Facsimile: 472-2342

Attorneys for Plaintiff
ROBERT J. DEL ROSARIO

FILED
DISTRICT COURT OF GUAM
MAR 10 2006 *af*
MARY L.M. MORAN
CLERK OF COURT

IN THE DISTRICT COURT OF GUAM

ROBERT J. DEL ROSARIO,

CIVIL CASE NO. 04-00028

Plaintiff,

vs.

AFFIDAVIT OF PLAINTIFF'S
COUNSEL

JAPAN AIRLINES INTERNATIONAL
CO., LTD.,

Defendant.

_____/

I, WILLIAM L. GAVRAS, ESQ., counsel for Plaintiff, after being duly sworn state
as follows:

1. Sometime near the early part of February, 2006, Plaintiff's counsel and
Plaintiff discussed the possibility of entering negotiations with defense counsel.
Sometime shortly thereafter, defense counsel communicated to the undersigned his
desire to negotiate.

2. After that the undersigned again discussed settlement with Plaintiff, both
in person and over the phone, and after receiving authorization from the Plaintiff, the
undersigned communicated an offer \$200,000.00 to defense counsel.

ORIGINAL

Del Rosario et. al. v. Japan Airlines International, et. al.,
Affidavit of Counsel
March, 2006

3. Defense counsel counter-offered with \$90,000.00. This counter-offer was communicated to defense counsel.
4. Plaintiff authorized the undersigned to offer \$175,000.00. The offer was communicated to defense counsel.
5. Defense counsel subsequently accepted the offer of \$175,000.00.
6. Plaintiff, himself, is aware of his option of filing a separate affidavit stating his position regarding facts relevant to establishing or denying the existence of a settlement in this matter. He is aware that the deadline for filing his affidavit is no later than March 15, 2006. The undersigned has met with Plaintiff and Plaintiff is aware that this affidavit is being prepared and will be filed with the Court. Plaintiff has not yet seen this affidavit but is aware that the above stated chronology would be provided to the Court. Plaintiff will be contacted by the undersigned in order that this affidavit may be reviewed by him prior to March 15, 2006.

Affiant sayeth naught.

LAW OFFICES OF GORMAN & GAVRAS

Date: March 10, 2006.

By: 

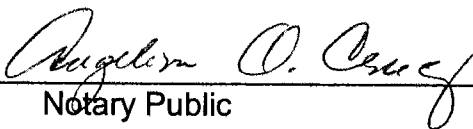
WILLIAM L. GAVRAS, ESQ.

Del Rosario et. al. v. Japan Airlines International, et. al.,
Affidavit of Counsel
March, 2006

In and for Guam, U.S.A.)

City of Hagatna)

Subscribed and sworn to before me this 10th day of March, 2006 by William L.
Gavras.



Notary Public

